

1 Eric J. Bakewell (SBN 241529)
2 EBakewell@willkie.com
3 Benita S. Yu (SBN 329195)
4 BYu@willkie.com
5 Sam R. Santopoalo (SBN 334919)
6 SSantopoalo@willkie.com
7 Emily Horak (SBN 340115)
8 EHorak@willkie.com
9 **WILLKIE FARR & GALLAGHER LLP**
10 2029 Century Park East, Suite 2900
11 Los Angeles, CA 90067
12 Telephone: (310) 855-3000
13 Facsimile: (310) 855-3099

14 *Attorneys for Defendant*
15 *HARMAN International Industries, Inc.*

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

19 ANNETTE CODY, individually and on
20 behalf of all others similarly situated,

21 Plaintiffs,

22 v.
23 HARMAN INTERNATIONAL
24 INDUSTRIES, INC.,

25 Defendant.

Case No. 2:23-cv-10845-PA-RAO

Assigned to Hon. Percy Anderson

**DEFENDANT HARMAN
INTERNATIONAL INDUSTRIES,
INC.'S REQUEST FOR JUDICIAL
NOTICE IN SUPPORT OF MOTION
TO DISMISS COMPLAINT FOR:
(1) LACK OF PERSONAL
JURISDICTION; AND (2) FAILURE
TO STATE A CLAIM**

*[Filed concurrently with Notice of
Motion and Motion to Dismiss and
[Proposed] Order]*

Hearing:

Date: March 25, 2024
Time: 1:30 p.m.
Courtroom: 9A

Complaint served: November 28, 2023
Action removed: December 27, 2023

REQUEST FOR JUDICIAL NOTICE

Defendant HARMAN International Industries, Inc. (“Harman”) will, and hereby does, request this Court to take judicial notice pursuant to Federal Rule of Evidence 201 of: (1) the court records attached hereto as Exhibits 1-7; (2) the fact that Plaintiff Annette Cody has filed over 20 cases (listed in Paragraph 8 below) since July 2022 that allege violations of the California Invasion of Privacy Act (“CIPA”); and (3) the fact that counsel for Cody filed over 80 similar actions (listed in Paragraphs 9 below) asserting violations of California Penal Code Section 638.51 for use of a pen register.

Initially, the Court may consider judicially noticed facts submitted in support of a motion to dismiss. *See Byars v. Hot Topic, Inc.*, 656 F. Supp. 3d 1051, 1060 (C.D. Cal. 2023) (taking judicial notice in support of motion to dismiss of “virtually identical lawsuits” filed by Cody’s counsel); *see also Mullis v. U.S. Bankr. Ct. Dist. Nev.*, 828 F.2d 1385, 1388 (9th Cir. 1987) (ruling the Court may consider judicially noticeable facts in support of a motion to dismiss).

Courts may take judicial notice of a fact that “is not subject to reasonable dispute” because the fact “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2). Courts, therefore, may take judicial notice of court records and basic facts regarding other cases because these records and facts are not subject to reasonable dispute and can be readily determined from sources whose accuracy cannot reasonably be questioned. *See Reyn’s Pasta Bella, LLC v. Visa USA, Inc.*, 442 F.3d 741, 746 n.6 (9th Cir. 2006) (taking judicial notice of court filings); *Duke v. Gastelo*, 64 F.4th 1088, 1093 n.3 (9th Cir. 2023) (taking judicial notice of facts regarding docket in other case); *Briseno v. Bonta*, 621 F. Supp. 3d 1065, 1070 (C.D. Cal. 2022) (taking judicial notice of facts regarding state court action involving similar claims and similar relief as federal action); *Selane Prods., Inc. v. Cont’l Cas. Co.*, — F. Supp. 3d —, 2020 WL 7253378,

1 at *3 (C.D. Cal. 2020) (“Under Federal Rule of Evidence 201, a court may take
 2 judicial notice of court filings and other matters of public record.”).

3 Courts must take judicial notice of facts that “can be accurately and readily
 4 determined from sources whose accuracy cannot reasonably be questioned” (such as
 5 court records and facts regarding court dockets) under certain circumstances provided
 6 in Federal Rule of Evidence 201. *See* Fed. R. Evid. 201(b). Specifically, a court must
 7 take judicial notice of these facts when: (1) “a party requests it;” and (2) “the court is
 8 supplied with the necessary information.” Fed. R. Evid. 201(c).

9 The Court must take judicial notice of the documents and facts subject to
 10 Harman’s notice given that Harman supplied the required information.

11 • First, the Court must take judicial notice of the court records attached
 12 hereto as Exhibits 1 through 7 because court records are proper subjects of judicial
 13 notice, Harman requested judicial notice be taken, and Harman furnished the Court
 14 with sufficient information to enable the Court to take judicial notice of the court
 15 records. *See* Fed. R. Evid. 201(c) (requiring judicial notice if party requests it and
 16 provides the necessary information); *Reyn’s Pasta Bella, LLC*, 442 F.3d at 746 n.6
 17 (allowing court to take judicial notice of court filings including pleadings).

18 • Second, the Court must take judicial notice of the fact that Cody has filed
 19 other CIPA actions since July 2022 in California state and federal courts as listed in
 20 Paragraph 8 because that fact can be readily determined and is judicially noticeable,
 21 Harman requested judicial notice, and Harman provided the requisite information for
 22 judicial notice. *See* Fed. R. Evid. 201(c) (requiring judicial notice upon party request
 23 with the necessary information); *Duke*, 64 F.4th at 1093 n.3 (finding facts about court
 24 dockets judicially noticeable).

25 • Third, the Court must take judicial notice of the fact that Cody’s counsel
 26 filed similar pen register claims under California Penal Code Section 638.51 as listed
 27 in Paragraph 9 because that fact can be readily determined and is judicially noticeable,
 28 Harman requested judicial notice, and Harman provided the requisite information for

1 judicial notice. *See* Fed. R. Evid. 201(c); *Duke*, 64 F.4th at 1093 n.3 (taking judicial
2 notice of facts about court dockets).

3 Accordingly, Harman respectfully requests that the Court take judicial notice of
4 the following court records and facts regarding court dockets:

5 **Court Records**

6 1. The Complaint filed on November 21, 2022 in United States District
7 Court for the Southern District of California in the action captioned *Greenley v.*
8 *Kochava, Inc.*, Case No. 22-cv-01327-BAS-AHG, a true and correct conformed copy
9 of which is attached to the hereto as **Exhibit 1**.

10 2. The Complaint filed on August 2, 2022 in United States District Court
11 for the Central District of California in the action captioned *Cody v. Boscovs, Inc.*,
12 Case No. 22-cv-01434-DOC-ADS a true and correct conformed copy of which is
13 attached to the hereto as **Exhibit 2**.

14 3. The Complaint filed on February 7, 2023 in United States District Court
15 for the Central District of California in the action captioned *Cody v. Lacoste USA,*
16 *Inc.*, Case No. 23-cv-00235-SSS-KK a true and correct conformed copy of which is
17 attached to the hereto as **Exhibit 3**.

18 4. The Complaint filed on November 17, 2023 in Los Angeles Superior
19 Court and removed to this Court on December 15, 2023 in the action captioned
20 *Casillas v. Sleep Number Corporation*, Case No. 2:23-cv-10540-WLH-MAR, a true and
21 correct conformed copy of which is attached to the hereto as **Exhibit 4**.

22 5. The Complaint filed on November 17, 2023 in Los Angeles Superior
23 Court and removed to this Court on December 29, 2023 in the action captioned
24 *Casillas v. ZAPPOS.COM LLC*, Case No. 2:23-cv-10876-WLH-JPR, a true and
25 correct conformed copy of which is attached to the hereto as **Exhibit 5**.

26 6. The Complaint filed on November 30, 2023 in Los Angeles Superior
27 Court and removed to this Court on January 16, 2024 in the action captioned *Martin v.*
28

1 *Char-Broil, LLC*, Case No. 2:24-cv-00395-RGK-JPR, a true and correct conformed
2 copy of which is attached to the hereto as **Exhibit 6**.

3 7. The Complaint filed on December 4, 2023 in Los Angeles Superior Court
4 and removed to this Court on January 11, 2024 in the action captioned *Palacios v.*
5 *Wolverine World Wide, Inc.*, Case No. 2:24-cv-00288-WLH-SSC, a true and correct
6 conformed copy of which is attached to the hereto as **Exhibit 7**.

7 **Facts Regarding Court Dockets**

8 8. Cody has filed over 20 cases in California state and federal courts that
9 assert claims under the California Invasion of Privacy Act (“CIPA”) since July 2022.

10 a. Seven of these other cases were filed in or removed to this Court
11 and include allegations that defendants violated CIPA by purportedly eavesdropping
12 on chat messages or by purportedly monitoring users’ keystrokes. These cases
13 include:

- 14 • United States District Court for the Central District of California
15 case filed on August 16, 2022 with the caption *Cody v. Promises*
16 *Behavior Health, LLC*, Case No. 22-cv-01529-FWS-JDE.
- 17 • United States District Court for the Central District of California
18 case filed on September 1, 2022 with the caption *Cody v. Athletic*
19 *Propulsion Labs LLC*, Case No. 22-cv-01627-JWH-DFM.
- 20 • United States District Court for the Central District of California
21 case with the caption *Cody v. Tiffany & Co.*, Case No. 22-cv-
22 01648-DOC-ADS that was removed to this Court on September 6,
23 2022.
- 24 • The United States District Court for the Central District of
25 California case with the caption *Cody v. Columbia Sportswear Co.*,
26 Case No. 22-cv-01654-DOC-JDE that was removed to this Court
27 on September 7, 2022.

- 1 • United States District Court for the Central District of California
2 case with the caption *Cody v. Paula's Choice, LLC*, Case No. 23-
3 cv-00182-JWH-JDE. That was removed to Federal Court on
4 January 30, 2023.
- 5 • United States District Court for the Central District of California
6 case with the caption *Cody v. ABT Electronics, Inc.*, Case No. 23-
7 cv-05222-CAS-PVC that was removed to this Court on June 30,
8 2023.
- 9 • United States District Court for the Central District of California
10 case filed on August 19, 2023 with the caption *Cody v. Glasses*
11 *USA, Inc.*, Case No. 23-cv-01545-JVS-KES.

12 b. Four of these other cases were filed in or removed to California
13 federal courts outside of this district and allege that defendants violated CIPA by
14 eavesdropping on chat messages. These cases include:

- 15 • United States District Court for the Southern District of California
16 case with the caption *Cody v. Movado Group, Inc.*, Case No. 23-
17 cv-00015-H-KSC that was removed to Federal Court on January 4,
18 2023.
- 19 • United States District Court for the Southern District of California
20 case with the caption *Cody v. Ashley Furniture Industries, LLC*,
21 Case No. 23-cv-00065-AJB-WVG that was removed to Federal
22 Court on January 12, 2023.
- 23 • United States District Court for the Northern District of California
24 case filed on February 8, 2023 with the caption *Cody v. Ring LLC*,
25 Case No. 23-cv-00562-AMO.
- 26 • United States District Court for the Northern District of California
27 case filed on May 10, 2023 with the caption *Cody v. E. Gluck*
28 *Corporation*, Case No. 23-cv-02286-HSG.

1 c. Eleven of these other cases were filed in California state court and
2 include allegations that defendants violated CIPA by purportedly eavesdropping on
3 chat messages or by purportedly monitoring visitors' keystrokes. These cases include:

- 4 • Orange County Superior Court case filed on July 28, 2022 with the
5 caption *Cody v. Dollar Shave Club Inc.*, Case No. 30-2022-
6 01272183-CU-MT-CXC.
- 7 • Orange County Superior Court case filed on August 2, 2022 with
8 the caption *Cody v. Warby Parker Corporation*, Case No. 30-2022-
9 01273354-CU-MT-CXC.
- 10 • Los Angeles Superior Court case filed on March 29, 2023 with the
11 caption *Cody v. Skullcandy, Inc.*, Case No. 23STCV06828.
- 12 • Los Angeles Superior Court case filed on April 5, 2023 with the
13 caption *Cody v. P.C. Richard and Son Service Company, Inc.*, Case
14 No. 23STCV07578.
- 15 • Los Angeles Superior Court case filed on November 8, 2023 with
16 the caption *Cody v. Modani Holdings, LLC*, Case No.
17 23STCV27495.
- 18 • Los Angeles Superior Court case filed on January 2, 2024 with the
19 caption *Cody v. B & H Foto & Electronics Corp.*, Case No.
20 24STCV00032.
- 21 • Los Angeles Superior Court case filed on January 2, 2024 with the
22 caption *Cody v. Backyard Design USA LLC*, Case No.
23 24STCV00067.
- 24 • Los Angeles Superior Court case filed on January 16, 2024 with
25 the caption *Cody v. Sundance Holdings Group, LLC*, Case No.
26 24STCV01046.
- 27 • Los Angeles Superior Court case filed on January 22, 2024 with
28 the caption *Cody v. BH Security, LLC*, Case No. 24STCV01627.

- 1 • Los Angeles Superior Court case filed on January 22, 2024 with
2 the caption *Cody v. Bright Market LLC*, Case No. 24STCV01660.
- 3 • Los Angeles Superior Court case filed on February 2, 2024 with
4 the caption *Cody v. Industrial Color, Inc.*, Case No.
5 24STCV02809.

6 9. Cody's counsel of record (Scott Ferrell at Pacific Trial Attorneys, APC)
7 has filed over 80 other cases containing similar allegations as those made against
8 Harman and involving alleged violations of California Penal Code Section 638.51 for
9 alleged use of a pen register since December 2023. These other cases filed by Cody's
10 counsel include:

- 11 • Los Angeles Superior Court case filed on November 13, 2023 with the
12 caption *Diaz v. Meridian Rack & Pinion, Inc.*, Case No. 23STCV27895.
- 13 • Los Angeles Superior Court case filed on December 1, 2023 with the
14 caption *Sanchez v. Pets Best Insurance Services, LLC*, Case No.
15 23STCV29362.
- 16 • Los Angeles Superior Court case filed on December 13, 2023 with the
17 caption *Casillas v. The Toro Company*, Case No. 23STCV30451.
- 18 • Los Angeles Superior Court case filed on December 13, 2023 with the
19 caption *Levings v. American Express Company*, Case No.
20 23STCV30449.
- 21 • Los Angeles Superior Court case filed on December 14, 2023 with the
22 caption *Casillas v. Turn 5, Inc.*, Case No. 23STCV30454.
- 23 • Los Angeles Superior Court case filed on December 15, 2023 with the
24 caption *Casillas v. Transitions Optical, Inc.*, Case No. 23STCV30742.
- 25 • Los Angeles Superior Court case filed on December 15, 2023 with the
26 caption *Levings v. Brighton Collectibles, LLC*, Case No. 23STCV30758.
- 27 • Los Angeles Superior Court case filed on December 20, 2023 with the
28 caption *Levings v. Viking Electric Supply, Inc.*, Case No. 23STCV31201.

- Los Angeles Superior Court case filed on December 20, 2023 with the caption *Sanchez v. National Instruments Corporation*, Case No. 23STCV31160.
- Los Angeles Superior Court case filed on December 21, 2023 with the caption *Levings v. Clarins U.S.A. Inc.*, Case No. 23STCV31207.
- Los Angeles Superior Court case filed on December 21, 2023 with the caption *Sanchez v. Find It Parts, Inc.*, Case No. 23STCV31206.
- Los Angeles Superior Court case filed on December 27, 2023 with the caption *Byars v. Divisible Inc.*, Case No. 23STCV31690.
- Los Angeles Superior Court case filed on December 27, 2023 with the caption *Byars v. Everstage Inc.*, Case No. 23STCV31685.
- Los Angeles Superior Court case filed on December 27, 2023 with the caption *Sanchez v. BLST Draper's & Damon's LLC*, Case No. 23STCV31538.
- Los Angeles Superior Court case filed on January 2, 2024 with the caption *Byars v. Almabase, Inc.*, Case No. 24STCV00010.
- Los Angeles Superior Court case filed on January 2, 2024 with the caption *Byars v. K & B Surgical Center, LLC*, Case No. 24STCV00014.
- Los Angeles Superior Court case filed on January 2, 2024 with the caption *Byars v. Primer Labs Inc.*, Case No. 24STCV00013.
- Los Angeles Superior Court case filed on January 2, 2024 with the caption *Byars v. Testsigma Technologies, Inc.*, Case No. 24STCV00008.
- Los Angeles Superior Court case filed on January 4, 2024 with the caption *Casillas v. Steel Technology, LLC*, Case No. 24STCV00201.
- Los Angeles Superior Court case filed on January 4, 2024 with the caption *Sanchez v. Weber-Stephen Products LLC*, Case No. 24STCV00217.

- Los Angeles Superior Court case filed on January 5, 2024 with the caption *Casillas v. Simon Pearce (U.S.), Inc.*, Case No. 24STCV00401.
- Los Angeles Superior Court case filed on January 5, 2024 with the caption *Levings v. 360Sweater Company, LLC*, Case No. 24STCV00403.
- Los Angeles Superior Court case filed on January 8, 2024 with the caption *Casillas v. Auctane, Inc.*, Case No. 24STCV00411.
- Los Angeles Superior Court case filed on January 8, 2024 with the caption *Levings v. Evolutions Brands, Inc.*, Case No. 24STCV00416.
- Los Angeles Superior Court case filed on January 8, 2024 with the caption *Sanchez v. Delta Galil USA, Inc.*, Case No. 24STCV00395.
- Los Angeles Superior Court case filed on January 12, 2024 with the caption *Byars v. Codebaby, Inc.*, Case No. 24STCV00982.
- Los Angeles Superior Court case filed on January 12, 2024 with the caption *Byars v. Localize Corporation*, Case No. 24STCV01110.
- Los Angeles Superior Court case filed on January 12, 2024 with the caption *Casillas v. Roku, Inc.*, Case No. 24STCV00983.
- Los Angeles Superior Court case filed on January 16, 2024 with the caption *Casillas v. Daniel Wellington Inc.*, Case No. 24STCV01071.
- Los Angeles Superior Court case filed on January 16, 2024 with the caption *Levings v. Stokke LLC*, Case No. 24STCV01129.
- Los Angeles Superior Court case filed on January 16, 2024 with the caption *Levings v. Violet Grey, Inc.*, Case No. 24STCV01125.
- Los Angeles Superior Court case filed on January 17, 2024 with the caption *Valenzuela v. Hooters of America, LLC*, Case No. 24STCV01382.
- Los Angeles Superior Court case filed on January 18, 2024 with the caption *Cantu v. Chargebee Inc.*, Case No. 24STCV01308.

- 1 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 2 caption *Casillas v. Hanesbrands Inc.*, Case No. 24STCV01291.
- 3 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 4 caption *Casillas v. Iherb Inc.*, Case No. 24STCV01277.
- 5 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 6 caption *Casillas v. Minerva Beauty, Inc.*, Case No. 24STCV01281.
- 7 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 8 caption *Casillas v. RW USA Corp.*, Case No. 24STCV01354.
- 9 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 0 caption *Casillas v. Traveler's Choice Travelware*, Case No.
- 1 24STCV01337.
- 2 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 3 caption *Garcia v. Bio-Techne Corporation*, Case No. 24STCV01286.
- 4 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 5 caption *Levings v. Cartera Commerce, Inc.*, Case No. 24STCV01290.
- 6 • Los Angeles Superior Court case filed on January 18, 2024 with the
- 7 caption *Levings v. Conversica Inc.*, Case No. 24STCV01285.
- 8 • Los Angeles Superior Court case filed on January 22, 2024 with the
- 9 caption *Levings v. Tempur Sealy International, Inc.*, Case No.
- 20 24STCV01612.
- 21 • Los Angeles Superior Court case filed on January 22, 2024 with the
- 22 caption *Palacios v. Wrestlingmart.Com, LLC*, Case No. 24STCV01607.
- 23 • Los Angeles Superior Court case filed on January 23, 2024 with the
- 24 caption *Casillas v. Thermos LLC*, Case No. 24STCV01821.
- 25 • Los Angeles Superior Court case filed on January 23, 2024 with the
- 26 caption *Palacios v. Terlato Wine Group, Ltd.*, Case No. 24STCV01814.

- Los Angeles Superior Court case filed on January 24, 2024 with the caption *Palacios v. Justice Brand Holdings LLC*, Case No. 24STCV01857.
- Los Angeles Superior Court case filed on January 25, 2024 with the caption *Palacios v. Gaffos Inc.*, Case No. 24STCV02034.
- Los Angeles Superior Court case filed on January 25, 2024 with the caption *Palacios v. Merle Norman Cosmetics, Inc.*, Case No. 24STCV02036.
- Los Angeles Superior Court case filed on January 26, 2024 with the caption *Palacios v. August Home, Inc.*, Case No. 24STCV02068.
- Los Angeles Superior Court case filed on January 30, 2024 with the caption *Casillas v. DocuSign, Inc.*, Case No. 24STCV02336.
- Los Angeles Superior Court case filed on January 30, 2024 with the caption *Casillas v. Instapage, Inc.*, Case No. 24STCV02315.
- Los Angeles Superior Court case filed on January 30, 2024 with the caption *Casillas v. Vitality Holdings, LLC*, Case No. 24STCV02329.
- Los Angeles Superior Court case filed on January 30, 2024 with the caption *Levings v. Barracuda Networks, Inc.*, Case No. 24STCV02299.
- Los Angeles Superior Court case filed on January 30, 2024 with the caption *Levings v. Manscaped, Inc.*, Case No. 24STCV02289.
- Los Angeles Superior Court case filed on January 30, 2024 with the caption *Palacios v. C & J Clark America, Inc.*, Case No. 24STCV02312.
- Los Angeles Superior Court case filed on January 30, 2024 with the caption *Sanchez v. Unite Eurotherapy, Inc.*, Case No. 24STCV02282.
- Los Angeles Superior Court case filed on February 1, 2024 with the caption *Levings v. Medallia, Inc.*, Case No. 24STCV02780.
- Los Angeles Superior Court case filed on February 1, 2024 with the caption *Levings v. Netapp, Inc.*, Case No. 24STCV02772.

- Los Angeles Superior Court case filed on February 1, 2024 with the caption *Palacio v. Curio Brands, LLC*, Case No. 24STCV02760.
- Los Angeles Superior Court case filed on February 1, 2024 with the caption *Palacios v. CBD.co*, Case No. 24STCV02662.
- Los Angeles Superior Court case filed on February 1, 2024 with the caption *Palacios v. Stack's-Bowers Numismatics, LLC*, Case No. 24STCV02701.
- Los Angeles Superior Court case filed on February 1, 2024 with the caption *Palacios v. The Chicago Wine Company, LLC*, Case No. 24STCV02717.
- Los Angeles Superior Court case filed on February 2, 2024 with the caption *Palacios v. Decibullz LLC*, Case No. 24STCV02827.
- Los Angeles Superior Court case filed on February 2, 2024 with the caption *Palacios v. Ebates Performance Marketing, Inc.*, Case No. 24STCV02824.
- Los Angeles Superior Court case filed on February 2, 2024 with the caption *Palacios v. Mulberry Company USA*, Case No. 24STCV02769.
- Los Angeles Superior Court case filed on February 5, 2024 with the caption *Palacios v. Great Wolf Resorts, Inc.*, Case No. 24STCV02863.
- Los Angeles Superior Court case filed on February 6, 2024 with the caption *Casillas v. Iterable, Inc.*, Case No. 24STCV03152.
- Los Angeles Superior Court case filed on February 7, 2024 with the caption *Casillas v. Pella Corporation*, Case No. 24STCV03158.
- Los Angeles Superior Court case filed on February 7, 2024 with the caption *Levings v. Gong.io Inc.*, Case No. 24STCV03183.
- Los Angeles Superior Court case filed on February 7, 2024 with the caption *Palacios v. Medlock Ames Vintners, LLC*, Case No. 24STCV03155.

- Los Angeles Superior Court case filed on February 8, 2024 with the caption *Palacios v. Wilson Sporting Goods Co.*, Case No. 24STCV03300.
- Los Angeles Superior Court case filed on February 7, 2024 with the caption *Palacios v. SurveyMonkey Inc.*, Case No. 24STCV03160.
- Los Angeles Superior Court case filed on February 14, 2024 with the caption *Levings v. The Danville Group*, Case No. 24STCV03745.
- Los Angeles Superior Court case filed on February 14, 2024 with the caption *Levings v. Illumina, Inc.*, Case No. 24STCV03760.
- Los Angeles Superior Court case filed on February 14, 2024 with the caption *Levings v. Boll & Branch LLC*, Case No. 24STCV03772.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Casillas v. Direct Financial Solutions, LLC*, Case No. 24STCV04131.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Casillas v. Resident Home LLC*, Case No. 24STCV04137.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Casillas v. Sage Software, Inc.*, Case No. 24STCV04145.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Sanchez v. Avon Co.*, Case No. 24STCV04147.
- Los Angeles Superior Court case filed on February 20, 2024 with the caption *Sanchez v. Wellness.com Inc.*, Case No. 24STCV04150.

CONCLUSION

For the foregoing reasons, Harman respectfully requests that the Court take judicial notice of the documents attached hereto as Exhibits 1-7 and the facts identified in Paragraphs 8-9.

1 Dated: February 23, 2024

WILLKIE FARR & GALLAGHER LLP

2 By: /s/ Eric J. Bakewell

3 Eric J. Bakewell

4 Benita S. Yu

Sam R. Santopoalo

Emily Horak

5 *Attorneys for Defendant*
6 *HARMAN International Industries, Inc.*

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WILLKIE FARR & GALLAGHER LLP
2029 CENTURY PARK EAST, SUITE 2900
LOS ANGELES, CA 90067
310.855.3000